

# **EXHIBIT 2**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS - FORT WORTH DIVISION**

**JOSEPH FRIEDHEIM,  
IASMIN FRIEDHEIM, and  
JF SOLUTIONS LTD.,**  
*Plaintiffs/Counter-Defendants*

v.

**THOMAS HOEBER and  
HÖEBER MEDIA, LLC,**  
*Defendants/Counter-Plaintiffs  
Intervenor*

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**Civil Action No. 4:20-cv-335**

**PLAINTIFFS' INITIAL DISCLOSURES PURSUANT TO RULE 26**

TO: Defendants/Counter-Plaintiff Thomas Hoeber and Intervenor Höeber Media, LLC, by and through their attorney of record, Brian Casper, via his email address, [brian.casper@klemchuk.com](mailto:brian.casper@klemchuk.com)

Plaintiffs Joseph Friedheim, Iasmin Friedheim, and JF Solutions Ltd. serve these, their disclosures pursuant to FED. R. CIV. PRO. 26(a)(1)(A).

NORRED LAW, PLLC

/s/ Warren V. Norred

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Attorney for Plaintiffs

CERTIFICATE OF SERVICE - I certify that the above was served on all parties seeking service in the instant case via the Court's e-file system on May 27, 2020.

/s/Warren V. Norred

**RULE 26(a) RESPONSES**

**(i) the name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;**

All parties named in the Original Complaint, as described in the Complaint as well as the following:

1. Kini Cassamo - knows of the authorship of the works and business.
2. Nuno Tuna Maldonado - assisted with digitizing the works.
3. Diana Jorge Trigo - industry leader in Portugal.
4. Courtney Meier - worked on JFS website.
5. Carrie Martin - worked on JFS website.
6. Roger Castillo - worked on JFS website.
7. Marina De Bras - owns Frutobidos.
8. Michael Felder - worked with Hoeber.
9. Christopher Titze - worked with Hoeber.

For more details, see (proposed) Third Amended Complaint.

Plaintiffs incorporate all individuals named by Defendants in their disclosures, and any amendment, whether superseded or not.

**(ii) a copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;**

The items attached to the complaint as exhibits.

**(iii) a computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; and**

Plaintiffs seek economic damages for the failure to allow the subject lease to occur, plus damages pursuant to § 1983 and attorney fees. The expected total will be around \$75k.

**(iv) for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

None at this time.